

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

A.G., a minor child; D.A., a minor child;
A.L., a minor child; M.K., a minor child;
and M.H., a minor child;

PLAINTIFFS,

VS.

AUTAUGA COUNTY BOARD OF
EDUCATION; JOSEPH BUTLER
and TERRY WRIGHT,

DEFENDANTS.

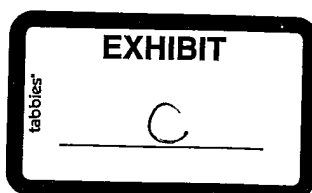
CASE NO: 2:05-CV-1090-W

DEFENDANTS' INITIAL DISCLOSURES

COME NOW defendants Autauga County Board of Education and Joseph L. Butler and pursuant to Federal Rule of Civil Procedure 26.1 and Local Rule 26.1, provide the following initial disclosures:

1. Defendants' investigation into the allegations of plaintiffs' complaint is still ongoing, and thus, upon information and belief, they are unable at this time to provide a complete list of all individuals likely to have discoverable information about the disputed facts. However, defendants provide the following individuals as persons believed to have discoverable, non-privileged personal knowledge concerning significant factual issues specifically raised in the pleadings:

- a. Plaintiff K.C., mother of minor plaintiff A.G., c/o plaintiffs' attorney;
- b. Plaintiff A.G., minor plaintiff, c/o plaintiffs' attorney;
- c. Plaintiff B.A., mother of minor plaintiff D.A., c/o plaintiffs' attorney;
- d. Plaintiff D.A., minor plaintiff, c/o plaintiffs' attorney;
- e. Plaintiff C.T., mother of minor plaintiff A.L., c/o plaintiffs' attorney;



- f. Plaintiff A.L., minor plaintiff, c/o plaintiffs' attorney;
- g. Plaintiff K.K., mother of minor plaintiff M.K., c/o plaintiffs' attorney;
- h. Plaintiff M.K., minor plaintiff, c/o plaintiffs' attorney;
- i. Plaintiff B.H., mother of minor plaintiff M.H., c/o plaintiffs' attorney;
- j. Plaintiff M.H., minor plaintiff, c/o plaintiffs' attorney;
- k. Joseph L. Butler, superintendent of the Autauga County school system, c/o defendants' attorney; and

- l. Terry Wright, former substitute teacher for the Autauga County school system, pro se defendant.

Defendants also identify any other individual listed in plaintiffs' Rule 26.1 disclosures, co-defendant Terry Wright's Rule 26.1 disclosures, the minor plaintiffs and parents' depositions, plaintiffs' witness list and plaintiffs' responses to defendants' discovery request.

2. Defendants' investigation into the allegations of plaintiffs' complaint is still ongoing, and thus, upon information and belief they are unable at this time to provide a complete list of all documents that may be used by them to support their defense of the allegations against them. However, defendants provide the following documents that may be used by them to support their defense of the allegations against them:

- a. Policies JAA, GAE, GAE-R, GBNAB and IFAB of the Autauga County Board of Education;
- b. State of Alabama Department of Education Substitute Teacher's License for Terry C. Wright; and
- c. Alabama Department of Human Resources Child Abuse/ Neglect Central

Registry Clearance of Terry C. Wright. Such documents will be made available for inspection upon request.

In addition to any above documents, defendants also identify any exhibits that are used in any depositions taken in this case, any documents produced during discovery by any party, any documents identified in plaintiffs' initial disclosures or exhibit lists and any documents identified in co-defendant Terry Wright's initial disclosures or exhibit lists.

3. Defendants do not claim damages; however, they reserve the right to claim fees, costs or other damages at a later time.

4. These defendants may be entitled to insurance related to the allegations in this Complaint. Any documents evidencing any such coverage will be made available for inspection upon request.

Defendants reserve the right to supplement these initial disclosures as additional information becomes available through discovery.



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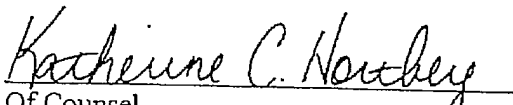
CERTIFICATE OF SERVICE

I hereby certify that I have on this 31st day of January, 2006, served a copy of the foregoing on counsel by mailing a copy of the same by United States Mail properly addressed and first class postage prepaid, to wit:

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